

Jerry C. Alexander
Texas State Bar No. 00993500
James F. Adams
Texas State Bar No. 00863450
Christopher A. Robison
Texas State Bar No. 24035720
PASSMAN & JONES
A Professional Corporation
1201 Elm Street, Suite 2500
Dallas, Texas 75270-2599
(214) 742-2121 Telephone
(214) 748-7949 Facsimile

COUNSEL FOR SUPERIOR AIR PARTS, INC.

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

In Re:	§	
	§	Case No. 08-36705-bjh-11
SUPERIOR AIR PARTS, INC.,	§	Chapter 11
	§	
Debtor.	§	
	§	

**THIRD AMENDED WITNESS AND EXHIBIT LIST IN SUPPORT OF
SUPERIOR AIR PARTS, INC.'S MOTION TO ENFORCE**

COMES NOW, Superior Air Parts, Inc. ("Superior") and files this Second Amended
Witness and Exhibit List in Support of Motion to Enforce [Dkt. 684], set for hearing on July 22,
2014 at 2:15 PM, and in support thereof would show the following:

WITNESS LIST

NAME	DESCRIPTION OF ANTICIPATED TESTIMONY TOPICS
Kent Abercrombie Superior Air Parts, Inc. 621 S. Royal Lane, #100 Coppell, TX 75019-3805	History of bankruptcy case and bankruptcy pleadings, the business relationship between Superior and TAE, Superior's ownership of its drawings and other technical data, the provision of technical data to TAE under confidentiality agreements, work performed by TAE on Superior's behalf, and Superior's PMA's and regulatory (FAA) compliance.
Charles B. Dedmon	Data and drawings owned by Superior, the business relationship between Superior and TAE, Superior's ownership of its drawings and other technical data, the provision of technical data to TAE

NAME	DESCRIPTION OF ANTICIPATED TESTIMONY TOPICS
	under confidentiality agreements, work performed by TAE on Superior's behalf, Superior's relationship with its manufacturers/suppliers, and Superior's PMA's and regulatory (FAA) compliance.
Keith Chatten Superior Air Parts, Inc. 621 S. Royal Lane, #100 Coppell, TX 75019-3805	Data, information and drawings owned by Superior currently in TAE/Kübler's possession, the business relationship between Superior and TAE, Superior's ownership of its drawings and other technical data, the provision of technical data to TAE under confidentiality agreements, work performed by TAE on Superior's behalf, and Superior's PMA's and regulatory (FAA) compliance.
Jasper M. Wolffson Brödermann & Jahn Neuer Wall 71 20354 Hamburg Germany	The business relationship between Superior and TAE, Superior's ownership of its drawings, information, and other technical data, the provision of technical data to TAE under confidentiality agreements, work performed by TAE on Superior's behalf, and Dr. Kübler's attempts to sell Superior's property.
Douglas Marwill RD Marwill & Associates 14004 Mint Trail San Antonio, TX 78232	Mr. Marwill is a testifying expert, and the topics on which he will testify are summarized on Exhibit "A" hereto.

EXHIBIT LIST

EXHIBIT NO.	DESCRIPTION OF EXHIBIT
1	Chapter 11 Voluntary Petition [Bankr. Doc. No. 1]
2	08-36705-bjh11 Docket Sheet
3	Schedules A-J with Summary of Schedules [Bankr. Doc. No. 4]
4	Schedule B22 – Domain Names [Bankr. Doc. No. 4-3]
5	Schedule B22 – List of PMAs [Bankr. Doc. No. 4-4]
6	Schedule B22 – Trademarks [Bankr. Doc. No. 4-5]
7	Schedule B23 – Type Certificates [Bankr. Doc. No. 4-6]
8	Schedule G – Open Purchase Orders [Bankr. Doc. No. 4-13]
9	Amended Schedule B with Exhibit [Bankr. Docs. Nos. 263 and 263-1]
10	Amended Schedule G with Exhibit [Bankr. Docs. Nos. 265 and 265-1]
11	Amended Disclosure Statement with Exhibits [Bankr. Docs. Nos. 321 – 321-3]
12	Amended Chapter 11 Plan [Bankr. Doc. No. 322]
13	Order Approving Fourth Amended Disclosure Statement [Bankr. Doc. No.

EXHIBIT NO.	DESCRIPTION OF EXHIBIT
	325]
14	Order Confirming Third Amended Plan of Reorganization [Bankr. Doc. No. 404]
15	Notice of Effective Date of the Third Amended Plan of Reorganization [Bankr. Doc. No. 432]
16	Affidavit In Support of Debtor's Expedited Motion to Approve Bid Procedures for Sale of Substantially All of Debtor's Assets Free and Clear of Liens with Exhibits [Bankr. Docs. Nos. 30 through 30-3]
17	Affidavit In Support of Debtor's Expedited Motion to Approve Bid Procedures for Sale of Substantially All of Debtor's Assets Free and Clear of Liens with Exhibits [Bankr. Docs. Nos. 31 through 31-2; also Adv. Doc. No. 8 - Superior 0655-Superior 0662 in Adv. Proc. No. 12-03035-BJH]
18	Supplier Agreement between Thielert Aircraft Engines GmbH and Superior Air Parts, Inc. dated December 15, 2001 and Amendments Thereto (SUPERIOR_000026-SUPERIOR_000044)
19	Letter from Craig Simon, Esq. to Christopher Robison, Esq. dated March 25, 2014
20	Summary of Documents Produced by Dr. Kübler in Discovery and Bates Labeled TAE IA000001-IA000736
21	Letter from Superior to TAE/Kübler dated April 24, 2013
22	Letter from counsel for TAE to Superior dated June 3, 2013
23	Letter from counsel for Superior to counsel for TAE dated July 18, 2013 (with attached list of part numbers)
24	Tolling Agreement effective as of August 1, 2013
25	Motion to Compel Arbitration and Exhibits Thereto Filed December 9, 2013 [Bankr. Dkt. 689]
26	Insolvency Administrator's Responses and Objections to Superior Air Parts Inc.'s First Set of Discovery Requests
27	Status Report and Agreed Motion to Continue Hearing [Bankr. Dkt. 711]
28	Exemplar Purchase Order from Superior to TAE (SUPERIOR_005336)
29	Exemplar Terms and Conditions to Superior Purchase Order (SUPERIOR_000082)
30	Superior Quality Requirements (SUPERIOR_000224 – SUPERIOR_000308)
31	Superior Air Parts Drawing for Part No. SL32500, Rev. E
32	TAE Duplicate Drawing of Superior Air Parts Part No. SL32500-E

EXHIBIT NO.	DESCRIPTION OF EXHIBIT
33	Superior Air Parts Drawing for Part No. SL36006W-A1
34	TAE Duplicate Drawing for Superior Air Parts Part No. SL36006W-A1
35	Superior Air Parts Drawing for Part No. SL18840-2
36	TAE Duplicate Drawing for Superior Air Parts Part No. SL18840-2
37	Superior Air Parts Drawing for Part No. SA47006L-A1
38	TAE Duplicate Drawing for Superior Air Parts Part No. SA47006L-A1
39	Superior Air Parts Drawing for Part No. SA52006-A1, Rev. G
40	TAE Duplicate Drawing for Superior Air Parts Part No. SA52006-A1-G
41	Superior Air Parts Drawing for Part No. SL36500, Rev. L
42	TAE Duplicate Drawing for Superior Air Parts Part No. SL36500-L
43	Superior Air Parts Drawing for Part No. SL11750-1
44	TAE Duplicate Drawing for Superior Air Parts Part No. SL11750-1
45	Superior Air Parts Drawing for Part No. SL36005
46	TAE Duplicate Drawing for Superior Air Parts Part No. SL36005
47	Superior Air Parts Drawing for Part No. SX20050
48	TAE Duplicate Drawing for Superior Air Parts Part No. 20050
49	Screen Shot of Superior Part No. SV78930 created from CAD file on TAE server
50	Screen Shot of Superior Part No. SV78940 created from CAD file on TAE server
51	Screen Shot of Superior Part No. SL36500 created from CAD file on TAE server
52	Screen Shot of Superior Part No. 40005 created from CAD file on TAE server
53	Superior Drawing for Superior Part No. SV78940
54	Superior Drawing for Superior Part No. SV78930
55	Superior Drawing for Superior Part No. SV40001
56	Summary of File Locations of Original Superior Documents and Information on TAE Server.
57	Summary of File Locations of Duplicate Superior Documents and Information on the TAE Server.
58	Deposition Exhibit 17.
59	Deposition Exhibit 18.

Superior reserves the right to offer any exhibit introduced at a deposition taken after the filing of this Witness and Exhibit List. Superior further reserves the right to examine any witness listed or called by any other party, and to call any impeachment and/or rebuttal witnesses. Superior further reserves the right to offer any exhibit listed or presented by any other party, and to offer any impeachment and/or rebuttal exhibits.

Respectfully submitted,

By: /s/ Christopher Robison

Jerry C. Alexander
Texas Bar No. 00993500
James F. Adams
Texas Bar No. 00863450
Christopher A. Robison
Texas Bar No. 24035720
Passman & Jones, P.C.
1201 Elm Street, Suite 2500
Dallas, Texas 75270-2599
(214) 742-2121 Telephone
(214) 748-7949 Facsimile
alexanderj@passmanjones.com
jimadams@passmanjones.com
robisonc@passmanjones.com

COUNSEL FOR SUPERIOR AIR
PARTS, INC.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served this 17th day of July, 2014, pursuant to the Federal Rules of Bankruptcy Procedure, via Facsimile and/or ECF/PACER upon the following:

Daniel P. Winikka and Craig Simon
Simon, Ray & Winikka LLP
2525 McKinnon Street, Suite 540
Dallas, Texas 75201

*Attorneys for Dr. Kübler, Insolvency
Administrator for TAE*

/s/ Christopher A. Robison
Christopher A. Robison